

## LAW OFFICES OF JILL R. SHELL

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80 Broad Street, Suite 1900, New York, NY 10004

June 7, 2022

### SEALING REQUESTED

#### BY EMAIL

The Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007  
[CaproniNYSDChambers@nysd.uscourts.gov](mailto:CaproniNYSDChambers@nysd.uscourts.gov)

**RE: *United States v. Ronald Glen Davis*, 21-cr-603 (VEC)**

Dear Judge Caproni:

I am writing on behalf of Glen Davis to respectfully request temporary modifications of his bail conditions so that he can fulfill contract obligations to perform his comedy show and engage in scheduled promotion and marketing events in Massachusetts, New Hampshire and Florida. Because this letter contains specific information about where Mr. Davis will be staying and about his family, I further respectfully request that I be permitted to file this request in a redacted form on ECF.

Mr. Davis is presently in New York. He is staying at [REDACTED]. Mr. Davis has commitments and requests permission for the following:

He wants to travel by car to Boston today and return by car to New York on June 12. Mr. Davis will stay in Boston from June 9-11 at [REDACTED]. Tonight, he will market his new career at a watch party in Boston when the Celtics play the Warriors. Mr. Davis has commitments for comedy shows in Boston and New Hampshire on June 11 and 12, and for convenience will stay in Boston. Mr. Davis will return to NY on June 12 for an interview for a podcast and he will again stay at [REDACTED]. On June 15<sup>th</sup>, to promote his comedy shows he is throwing out the first pitch at the Wooster Woo Sox v. Toledo Mud Hens, a minor league game being played in Wooster, Massachusetts. On June 16, he will return to Los Angeles. He has not made his airplane reservations. On June 18, Mr. Davis wants to fly to Orlando, Florida. He has a comedy show commitment in Orlando on June 19 and requests permission to stay in Orlando until June 24 [REDACTED]. In Orlando, FL, Mr. Davis will stay [REDACTED].

**The Honorable Valerie Caproni**  
**United States District Judge**

June 8, 2022

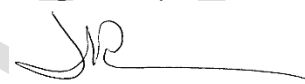
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[REDACTED]. Currently, Mr. Davis has contract commitments to perform comedy shows on July 22, 2022 in Providence, MA and on September 10, 2022 in Pepperell, MA. He has not made any travel arrangements.

I emailed both the prosecutors and Pretrial Services about Mr. Davis' June 11 and June 19 commitments. At the time, I did not have any additional information, and I did not ask about any other travel. In general, the prosecutors emailed that they have no objection to Mr. Davis' travel and lodging for work on June 11 and 19 assuming that Pretrial Services does not object and with information about travel and lodging. The email I received from Pretrial Services stated that "Pretrial Services has no issue with the defendant's travel across state lines for verifiable employment activities. However, since he is not permitted to travel freely within the continental US, his travel needs to be purposeful and travel plans - specific. Mr. Davis is to provide his supervising officer with his travel itinerary (flight booking, hotel reservations, etc.) ahead of travel...."

Thank you for your consideration.

Respectfully submitted,



Jill R. Shellow

cc: AUSA Kristy Greenberg  
AUSA Ryan Finkel  
PTS Supervisor Dennis Khilkevich  
PT Officer Tiffany Rivers  
PTS Officer Karina Chin Vilefort  
Glen Davis